

## **REMARKS AND STATEMENT OF SUBSTANCE OF INTERVIEW**

Claims 25-162 are pending after this amendment, of which claims 51-58 and 60-81 have been withdrawn. Claims 1-24 have been canceled.

Applicant has amended claims 25, 30, 43, 105, and 108-109 in order to more particularly define the invention. The amendments were not necessitated by the claim rejections. Applicant makes no admission as to the patentability or unpatentability of the originally filed claims.

Claims 112-162 have been added to more particularly define the invention.

The amendments and remarks presented herein are in response to the Office Action dated August 3, 2006.

On October 20, 2006, the Examiner and Applicants' representative conducted a telephone interview to discuss the present office action and claims. On November 3, 2006, a follow-up telephone interview took place. Applicants thank the Examiner for the opportunity to discuss this case, and wish to particularly thank the Examiner for his time and effort in providing thoughtful comments so as to assist in advancing prosecution of this patent application.

In the November 3 interview, Applicants' representative proposed adding language to the independent claims to clarify that the claims are directed to a non-foldable QWERTY keyboard that is oriented perpendicularly with respect to the long

axis of the device or case. Examiner agreed that such recitations would render the claims distinguishable over the presently cited references.

Accordingly, Applicants have added such language to all of the independent claims and respectfully submit that such claims, as well as the claims that depend therefrom, are now patentably distinct over the cited references.

In the Office Action of August 3, 2006, the Examiner rejected claims 25, 26, 29, 30, 43, and 99 through 101 under 35 USC 102(b) as being anticipated by Nokia. This rejection is respectfully traversed. As discussed above, claim 25 has been amended to recite “a non-foldable QWERTY keyboard located on the front face and having key rows oriented perpendicularly with respect to the long axis of the case.” By contrast, Nokia clearly depicts and describes a keyboard that is “moveable about a hinged joint” (Abstract) and has an open and closed position (par. 0007-0008; also Figs. 1 and 2). Furthermore, Nokia’s keyboard has rows oriented parallel (not perpendicular) to the long axis of the case (Fig. 2).

Claims 26 and 29 depend from claim 25 and incorporates the above-quoted recitations. Claims 30, 43, and 99-101 recite similar limitations. Accordingly, claims 25, 26, 29, 30, 43, and 99 through 101 are respectfully submitted to be patentable over Nokia.

The Examiner rejected claim 108 under 35 USC 102(b) as being anticipated by Blish. This rejection is respectfully traversed. As discussed above, claim 108 has

been amended to recite “a non-foldable QWERTY keyboard comprising: a plurality of keys arranged in a QWERTY configuration having key rows oriented perpendicularly with respect to the long axis of the device.” By contrast, Blish clearly depicts and describes a keyboard that has two pieces (col. 1, lines 28-30; Figs. 1, 2) and whose key rows are oriented parallel (not perpendicular) to the long axis of the case (Figs. 1, 2). Accordingly, claim 108 is respectfully submitted to be patentable over Blish.

The Examiner rejected claims 27, 28, 31-37, 41, 42, and 105-107 under 35 USC 103(a) as being unpatentable over Nokia in view of Blish. This rejection is respectfully traversed. All of these claims include language substantially reciting a non-foldable QWERTY keyboard having key rows oriented perpendicularly with respect to the long axis of the case or device. As discussed above, neither Nokia nor Blish teach or describe such limitations. Accordingly, these claims are respectfully submitted to be patentable over the cited references, taken alone or in any combination.

The Examiner rejected claims 38-40 under 35 USC 103(a) as being unpatentable over Nokia in view of Blish and further in view of Dayton. Claims 38-40 depend from claim 31 and incorporate the above-discussed limitations which are neither taught nor suggested by Nokia and Blish. Dayton does nothing to cure this deficiency, as its keyboard has key rows that are oriented parallel (not perpendicular)

to the long axis of the case (Fig. 4). Accordingly, these claims are respectfully submitted to be patentable over the cited references, taken alone or in any combination.

The Examiner rejected claims 43-45, 48, 84-87, 89, 90, 92-97, and 109-111 under 35 USC 103(a) as being unpatentable over Siitonen in view of Blish. As discussed above, claim 43 has been amended to recite “a non-foldable keyboard comprising: a plurality of keys arranged in a QWERTY configuration having key rows oriented perpendicularly with respect to the long axis of the device.” Neither of the cited references disclose such limitations. Siitonen’s keyboard has key rows that are oriented parallel (not perpendicular) to the long axis of the case (Fig. 2B). As discussed above, Blish clearly depicts and describes a keyboard that has two pieces (col. 1, lines 28-30; Figs. 1, 2) and whose key rows are oriented parallel (not perpendicular) to the long axis of the case (Figs. 1, 2). Accordingly, these claims are respectfully submitted to be patentable over the cited references, taken alone or in any combination.

The Examiner rejected claims 46, 47, 49, 50, 83, and 104 under 35 USC 103(a) as being unpatentable over Siitonen in view of Blish and further in view of Dayton. Claims 46, 47, 49, 50, 83, and 104 depend from claim 43 and incorporate the above-discussed limitations which are neither taught nor suggested by Siitonen and Blish. Dayton does nothing to cure this deficiency, as its keyboard has key rows that are

oriented parallel (not perpendicular) to the long axis of the case (Fig. 4).

Accordingly, these claims are respectfully submitted to be patentable over the cited references, taken alone or in any combination.

The Examiner rejected claims 59 and 82 under 35 USC 103(a) as being unpatentable over Siitonen in view of Blish and further in view of Dayton and further in view of Krishnan. Claims 59 and 82 depend from claim 49 and incorporate the above-discussed limitations which are neither taught nor suggested by Siitonen, Blish, and Dayton. Krishnan does nothing to cure this deficiency, as it merely describes a cluster key arrangement for a keypad, and does not teach or describe any QWERTY keyboard. Accordingly, these claims are respectfully submitted to be patentable over the cited references, taken alone or in any combination.

The Examiner rejected claim 88 under 35 USC 103(a) as being unpatentable over Siitonen in view of Blish and further in view of Bartlett. Claim 88 depends from claim 87 and incorporates the above-discussed limitations which are neither taught nor suggested by Siitonen and Blish. Bartlett does nothing to cure this deficiency, as it merely describes a signaling system for remote operation of a calculator, and does not teach or describe any QWERTY keyboard. Accordingly, these claims are respectfully submitted to be patentable over the cited references, taken alone or in any combination.

The Examiner rejected claim 98 under 35 USC 103(a) as being unpatentable over Siitonen in view of Blish and further in view of Welch. Claim 98 depends from claim 96 and incorporates the above-discussed limitations which are neither taught nor suggested by Siitonen and Blish. Welch does nothing to cure this deficiency, as it merely describes backlit buttons for keys, and does not teach or describe any QWERTY keyboard having the characteristics recited herein. Accordingly, these claims are respectfully submitted to be patentable over the cited references, taken alone or in any combination.

New claims 112-162 have been added to more particularly claim aspects of the Applicants' invention. These claims depend from existing independent claims that have been amended to include the proposed language discussed with the Examiner. These claims also recite additional limitations that render them distinct from the cited references. Accordingly, for at least the reasons given above, such claims are submitted to be patentable over the cited references.

Support for the new claims appears in the originally filed specification at, for example, paragraphs 0029, 0041-0044, and Figs. 1A, 3B, and 6A. No new matter has been added.

On the basis of the above amendments, consideration of this application and the early allowance of all claims herein are requested.

Should the Examiner wish to discuss the above amendments and remarks, or if the Examiner believes that for any reason direct contact with Applicant's representative would help to advance the prosecution of this case to finality, the Examiner is invited to telephone the undersigned at the number given below.

Respectfully submitted,  
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